

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ZAHRA MOWAFY,

Plaintiff,

v.

NORAMCO OF DELAWARE, INC., and
NORAMCO, INC.

Defendant.

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: NO. 05-733-JJF
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**JOINT STIPULATION AND ORDER TO MODIFY SCHEDULING ORDER
TO EXTEND TIME**

Defendants Noramco of Delaware, Inc. and Noramco, Inc. (collectively referred to as “Defendants”), and Plaintiff Zahra Mowafy (“Plaintiff”), through their respective counsel, hereby agree and stipulate as follows:

1. Pursuant to the Scheduling Order (D.I. 36) entered October 29, 2007 by Magistrate Judge Mary Pat Thyng, discovery is set to close in this matter on May 30, 2008.
2. Over the past several months, the parties have engaged in discovery in this matter.
3. Specifically, the parties have exchanged their Initial Disclosures, as well as answers and responsive documents to interrogatories and document requests.
4. Due to the schedules of Defendant’s and Plaintiff’s counsel, as well as the fact that several witnesses live out of state, the parties have thus far been unsuccessful in scheduling and conducting depositions, and believe that they will not have the opportunity to finish conducting depositions prior to May 30, 2008.

5. Because the parties believe they will be unable to complete all depositions and other discovery prior to May 30, 2008, the parties hereby stipulate and agree, subject to the approval of the Court, to an extension of the discovery deadline until Thursday, August 28, 2008.

6. In addition, subject to the approval of the Court, Defendants' deadline to submit an expert report should be extended to Tuesday, July 29, 2008. Plaintiff does not plan to use an expert in this matter.

7. Moreover, subject to the approval of the Court, the deadline for dispositive motions also should be extended by thirty (30) days so that all case dispositive motions be due on Monday, September 29, 2008. The Scheduling Order entered by Magistrate Judge Mary Pat Thyng did not include a trial date.

8. No other extensions of the discovery deadline have been requested or granted in this matter.

Respectfully submitted,

/ S /

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Dated: May 20, 2008

/ S /

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SO ORDERED this _____ day of _____, 2008

United States District Judge